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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION ) MDL NO. 1917  
This Document Relates to: ) Case No. 07-cv-5944-JST  
Indirect Purchaser Class Action )  
 ) **DECLARATION OF GERARD A.  
DEVER IN SUPPORT OF INDIRECT  
PURCHASER PLAINTIFFS' RESPONSE  
TO IRICO DEFENDANTS' MOTION IN  
LIMINE NO. 4**  
 )  
 )  
 )  
 ) Hearing Date: December 15, 2023  
 ) Time: 2:00 p.m.  
 ) Courtroom: 6, 2nd Floor  
 )  
 ) The Honorable Jon S. Tigar

1 I, Gerard A. Dever, hereby declare and state as follows:

2 1. I am a member of the law firm Fine, Kaplan and Black, R.P.C., counsel for the  
3 Indirect Purchaser Plaintiffs (“Plaintiffs”) in the above-captioned action currently pending in the  
4 U.S. District Court for the Northern District of California. I am a member in good standing of the  
5 bar of the Commonwealth of Pennsylvania and I am admitted *pro hac vice* to practice before this  
6 Court. I submit this Declaration in support of Plaintiffs’ Response to Irico Defendants’ Motion *in*  
7 *Limine* No. 4: to preclude the parties from conflating CNEIECC with any Irico entity.

8 2. Attached hereto as Exhibit 1 is a true and correct copy of a document produced in  
9 this litigation bearing Bates stamp IRI-CRT-00002041–2105 and its English translation. It was  
10 marked as deposition exhibit 8401.

11 3. Attached hereto as Exhibit 2 is a true and correct copy of a document produced in  
12 this litigation bearing Bates stamp IRI-CRT-00000956–1010 and its English translation. It was  
13 marked as deposition exhibit 8394.

14 4. Attached hereto as Exhibit 3 is a true and correct copy of Irico Defendants’  
15 Supplemental Objections and Responses to Indirect Purchaser Plaintiffs’ Second Set of  
16 Interrogatories, No. 4, dated November 2, 2018.

17 5. Attached hereto as Exhibit 4 is a true and correct copy of a translation of a  
18 document produced in this litigation bearing Bates stamp IRI-CRT-00003498-99E. It was  
19 marked as deposition exhibit 8393.

20 6. Attached hereto as Exhibit 5 is a true and correct copy of a file produced in this  
21 litigation bearing Bates stamps IRI-CRT-00003546 and its English translation. It was marked as  
22 deposition exhibit 8413.

23 7. Attached hereto as Exhibit 6 is a true and correct copy of a document produced in  
24 this litigation bearing Bates stamp IRI-CRT-00003578-79E and its English translation. It was  
25 marked as deposition exhibit 8408.

1       8. Attached hereto as Exhibit 7 is a true and correct copy of a file produced in this  
2 litigation bearing Bates stamp IRI-CRT-00003576-77E and its English translation. It was marked  
3 as deposition exhibit 8407.

4       9. Attached hereto as Exhibit 8 is a true and correct copy of a document produced in  
5 this litigation bearing Bates stamp IRI-CRT-00003574 and its English translation.

6       10. Attached hereto as Exhibit 9 is a true and correct copy of IRICO Group  
7 Electronics' 2010 Annual Report.

8       11. Attached hereto as Exhibit 10 is a true and correct copy of a translation of a  
9 document produced in this litigation bearing Bates stamp IRI-CRT-00001154E.

10      12. Attached hereto as Exhibit 11 is a true and correct copy of a translation of a  
11 document produced in this litigation bearing Bates stamp and IRI-CRT-00001155E.

12      13. Attached hereto as Exhibit 12 is a true and correct copy of a document produced  
13 in this litigation bearing Bates stamp CHU00030303-04. It was marked as deposition exhibit  
14 8584.

15      14. Attached hereto as Exhibit 13 is a true and correct copy of excerpts of the  
16 transcript of the deposition of Wang Zhaojie on September 21, 2022.

17      15. Attached hereto as Exhibit 14 is a true and correct copy of a translation of a  
18 document produced in this litigation bearing Bates stamp IRI-CRT-00023923-24E and its  
19 English translation. It was marked as deposition exhibit 8586.

20      16. Attached hereto as Exhibit 15 is a true and correct copy of a document produced  
21 in this litigation bearing Bates stamp CHU00016169-70. It was marked as deposition exhibit  
22 8587.

23      17. Attached hereto as Exhibit 16 is a true and correct copy of a document produced  
24 in this litigation bearing Bates stamp IRI-CRT-00033206-09. It was marked as deposition exhibit  
25 8589.

26      18. Attached hereto as Exhibit 17 is a true and correct copy of a *People's Daily* article  
27 dated November 20, 2000, and its English translation. It was marked as deposition exhibit 8396.

1       19. Attached hereto as Exhibit 18 is a true and correct copy of a document produced  
2 in this litigation bearing Bates stamp BMCC-CRT-000306758. It was marked as deposition  
3 exhibit 8590.

4           I declare under penalty of perjury under the laws of the United States that the foregoing is  
5 true and correct.

6           Executed on September 1, 2023, in Philadelphia, Pennsylvania.

7           Dated: September 1, 2023

8           By: /s/ Gerard A. Dever

9           Gerard A. Dever  
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16           *Counsel for Indirect Purchaser Plaintiffs*